

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

IN RE: ) CASE NO. 1:18-BK-04971-HWV  
EDWARD A. HAGGANS ) CHAPTER 13  
DEBTOR )  
 )

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND  
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING  
PROPERTY DESCRIBED AS 2131 GREEN STREET, HARRISBURG, PA 17110 AND  
THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER  
\*\*\*\*\*1422**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Mario Hanyon  
Brock and Scott, PLLC  
Attorneys at Law  
302 Fellowship Road, Ste 130  
Mount Laurel, NJ 08054  
[pabkr@brockandscott.com](mailto:pabkr@brockandscott.com)

Freedom Mortgage  
10500 Kincaid Drive  
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

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Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Mario Hanyon

Mario Hanyon  
Attorney at Law (203993)  
Brock & Scott, PLLC  
302 Fellowship Road, Ste 130  
Mount Laurel, NJ 08054  
844-856-6646 x4560  
704-369-0760  
[pabkr@brockandscott.com](mailto:pabkr@brockandscott.com)

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## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on June 2, 2021 to the following:

EDWARD A. HAGGANS  
2131 GREEN ST  
HARRISBURG, PA 17110-1030

Cunningham, Chernicoff & Warshawsky, PC  
P.O. Box 60457  
2320 N. Second Street  
Harrisburg, PA 17106  
[jhr@cclawpc.com](mailto:jhr@cclawpc.com)

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Asst. U.S. Trustee, US Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101

/s/ Mario Hanyon  
Mario Hanyon  
Attorney at Law (203993)  
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302 Fellowship Road, Ste 130  
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844-856-6646 x4560  
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